

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

May 15, 2020

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs"), on behalf of all Plaintiffs and on behalf of the Department of Justice ("DOJ") and Federal Bureau of Investigation ("FBI"), write to present their joint proposal for further briefing on Plaintiffs' Motion to Compel Directed to the FBI, and the FBI's Opposition to Plaintiffs' Motion to Compel and Cross Motion for a Protective Order ("Opposition and Cross Motion").

As the Court will recall, the FBI requested several extensions of the deadline for filing its Opposition and Cross Motion, and in connection with those extension requests, the parties advised the Court that they would confer on a schedule for further briefing after the FBI filed its Opposition and Cross Motion. *See* March 16, 2020 letter at p. 2 (ECF No. 6068), and Order (ECF No. 6078). Based on those discussions, Plaintiffs and the FBI jointly propose the following schedule for further briefing:

1. Plaintiffs' Opposition to the FBI's Cross Motion for Protective Order and Reply in Support of their Motion to Compel to be filed on or before June 5, 2020;<sup>1</sup>

<sup>1</sup> In connection with the discussions concerning the above briefing schedule, Plaintiffs advised the FBI that logistical challenges of the present moment may require Plaintiffs to seek a brief extension of the June 5, 2020 deadline contemplated by this schedule, but that Plaintiffs thought it would be preferable to set the June 5, 2020 deadline and proceed from there. The FBI has communicated its understanding of these circumstances.

Honorable Sarah Netburn

May 15, 2020

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2. The FBI's Reply Brief in Support of its Cross Motion for a Protective Order to be filed on or before July 2, 2020.

Plaintiffs and the FBI and DOJ respectfully request that the Court endorse the briefing schedule set forth above.

Respectfully submitted,

KREINDLER & KREINDLER LLP

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*On behalf of the MDL 1570 Plaintiffs' Exec.  
Committees*

*On behalf of the MDL 1570 Plaintiffs' Exec.  
Committees*

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*On behalf of the MDL 1570 Plaintiffs' Exec.  
Committees*

cc: The Honorable George B. Daniels (via ECF)  
All Counsel of Record (via ECF)